

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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December 12, 2022

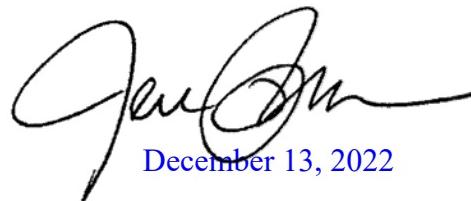
**BY ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Application GRANTED. The pretrial conference is hereby ADJOURNED to January 31, 2023, at 2:30 p.m. Time is excluded in the interests of justice from today, December 13, 2022 until January 31, 2023 for the reasons stated in defense counsel's letter. The Clerk of Court is directed to terminate Doc. #12. SO ORDERED.

**RE: United States v. Gustavo Chavez**  
**22 Cr. 303 (JMF)**

Dear Judge Furman:

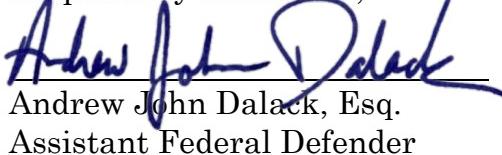


December 13, 2022

I write on behalf of the parties to provide a status update in the above-captioned case, and to request a 45-day adjournment of the conference scheduled for December 14, 2022.

The parties remain engaged in plea negotiations. Given Mr. Chavez's age, lack of a criminal record, chronic illness, and immigration status, the defense is attempting to negotiate a resolution to his case that will neither require a term of imprisonment nor necessarily cause him to be deported. The defense needs more time to finalize and submit its mitigation letter. The Government consents to this application, and moves for the exclusion of time under 18 U.S.C. § 3161(h)(7)(A). The defense consents to this application and agrees that the interests of the public and Mr. Chavez in a speedy trial are outweighed by the need to advance productive plea negotiations. The defense also wishes to inform the Court that Mr. Chavez remains fully compliant with the terms of his pre-trial supervision and has a strong rapport with his pre-trial officer.

Respectfully Submitted,



Andrew John Dalack, Esq.  
Assistant Federal Defender

Counsel for Gustavo Chavez

Cc: AUSA Andrew Jones